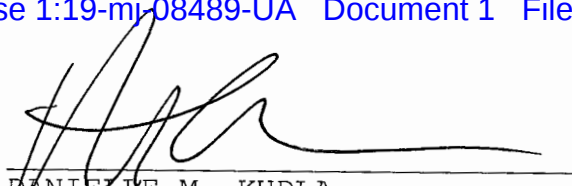


ORIGINAL

Approved:


DANIELLE M. KUDLA
Assistant United States Attorney

Before: THE HONORABLE JAMES L. COTT
United States Magistrate Judge
Southern District of New York

- - - - - x
: 19 MAG 8489
UNITED STATES OF AMERICA :
: 17 Mag.
- v. - :
: RULE 5(c)(3)
ALBERT PAULIN, : AFFIDAVIT
: Defendant. :
: :
- - - - - x

SOUTHERN DISTRICT OF NEW YORK, ss:

JOSE MENA, being duly sworn, deposes and says that he is a Postal Inspector with United States Postal Inspection Service ("USPIS"), and charges as follows:

On or about September 5, 2019, the United States District Court for the District of New Hampshire issued a warrant for the arrest of "Albert Paulin" in connection with an Indictment charging conspiracy to commit bank fraud, in violation of 18 U.S.C. § 1349, bank fraud, in violation of 18 U.S.C. § 1344, and aggravated identity theft, in violation of 18 U.S.C. § 1028A. Copies of the Arrest Warrant and the Indictment are attached hereto as Exhibit A and incorporated by reference herein.

I believe that ALBERT PAULIN, the defendant, who was arrested by the New York Police Department ("NYPD") in the Southern District of New York, is the same individual as "Albert Paulin," who is wanted in the District of New Hampshire.

The bases of my knowledge and for the foregoing charge are, in part, as follows:

1. I am a Postal Inspector with USPIS. I have been directly involved in determining whether ALBERT PAULIN, the

defendant, is the same individual as the "Albert Paulin," named in the September 5, 2019 Arrest Warrant from the United States District Court for the District of New Hampshire. Because this Affidavit is submitted for the limited purpose of establishing the identity of the defendant, I have not included in this Affidavit each and every fact that I have learned. Where I report statements made by others, those statements are described in substance and in part, unless otherwise noted.

2. Based on my involvement in this investigation, including my conversations with investigating agents, I have learned that:

a. On or about September 5, 2019, the United States District Court for the District of New Hampshire issued a warrant for the arrest of "Albert Paulin."

b. The warrant was issued in connection with an Indictment assigned criminal case number 19-cr-165. The bases for the warrant were charges in the Indictment, specifically, that "Albert Paulin" had violated 18 U.S.C. §§ 1028A, 1344, and 1349.

3. Based on my personal involvement in this investigation, including my conversations with investigating agents, I have learned that:

a. At approximately 6:00 p.m. on May 14, 2019, ALBERT PAULIN, the defendant, was arrested in the Southern District of New York by NYPD and charged with grand larceny in the fourth degree.

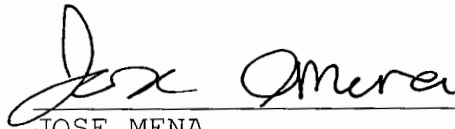
b. On or about September 10, 2019, PAULIN, the defendant, appeared before the New York Criminal Court located at 100 Centre Street in Manhattan, New York for a court appearance related to this charge.

c. On or about the same date, I observed that PAULIN, the defendant, had a tattoo with the name "Albert" inscribed on his right forearm.

4. I have reviewed a photograph of the "Albert Paulin" wanted by the District of New Hampshire provided to me by the lead USPS Postal Inspector of the District of New Hampshire investigation ("Photograph-1"). Photograph-1 showed "Albert Paulin's" face and upper body. A tattoo with the name "Albert" was visible on "Albert Paulin's" right forearm in Photograph-1. Based on my review of Photograph-1, and my personal observations

of ALBERT PAULIN, the defendant, on or about September 10, 2019, I believe that PAULIN is the same person as "Albert Paulin," who is wanted in the District of New Hampshire.

WHEREFORE, deponent respectfully requests that ALBERT PAULIN, the defendant, be imprisoned or bailed as the case may be.

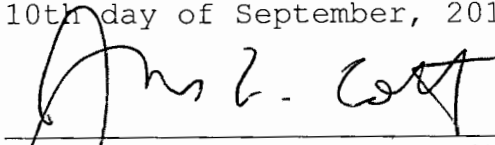


JOSE MENA

Postal Inspector

United States Postal Inspection Service

Sworn to before me this
10th day of September, 2019.



THE HONORABLE JAMES L. COTT
United States Magistrate Judge
Southern District of New York

EXHIBIT A

U.S. DISTRICT COURT
DISTRICT OF NH
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE
2019 SEP -4 PM 3:57

UNITED STATES OF AMERICA)
)
v.)
)
ALBERT PAULIN,)
Defendant)
_____)

FILED

Criminal Case No. 19-CR-105-JL-01

INDICTMENT

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 1349 – Conspiracy to Commit Bank Fraud]

Background

At all times relevant to this Indictment:

1. Citizens Bank was a financial institution as defined by Title 18, United States Code, Section 20, the deposits of which were insured by the Federal Deposit Insurance Corporation (“FDIC”).
2. Citizens Bank had branch locations in New Hampshire, Connecticut, Delaware, Massachusetts, Michigan, New Jersey, New York, Ohio, Pennsylvania, Rhode Island, and Vermont.
3. When accounting for loss due to fraud, Citizens Bank considers the funds to be located in the account from which the funds are withdrawn. Thus, for example, if funds are withdrawn from an account opened in a New Hampshire branch, Citizens Bank will “charge off” the loss to that New Hampshire branch, regardless of where the actual withdrawal took place.

4. TD Bank was a financial institution as defined by Title 18, United States Code, Section 20, the deposits of which were insured by the FDIC.

5. TD Bank had branch locations in New Hampshire, Connecticut, Delaware, Florida, Maine, Maryland, Massachusetts, New Jersey, New York, North Carolina, Pennsylvania, Rhode Island, South Carolina, Texas, Vermont, Virginia, and Washington, D.C.

The Conspiracy

6. Beginning on an unknown date, but at least by in or around August 2017, and continuing to in or around January 2018, in the District of New Hampshire and elsewhere, the defendant,

ALBERT PAULIN,

knowingly and willfully conspired and agreed with a confidential individual ("CI-1"), and other persons known and unknown to the Grand Jury, to devise and execute and attempt to execute a scheme and artifice to defraud Citizens Bank and TD Bank (the "financial institutions") and to obtain money in the custody and control of the financial institutions by means of false and fraudulent pretenses, representations and promises, in violation of Title 18 United States Code Sections 1349 and 1344.

Manner and Means

7. It was a part of the conspiracy that PAULIN took CI-1 to Citizens Bank branch locations and provided CI-1 with false drivers' licenses that contained Citizens Bank customers' personal identifying information and CI-1's photograph. CI-1 then withdrew and attempted to withdraw money from those Citizens Bank customers' accounts using the false driver's license and customers' bank account numbers provided to him by PAULIN. It was foreseeable to PAULIN that accounts affected by this conduct were located in ^{at} Citizens Bank branch offices in New Hampshire because, as part of the conspiracy, PAULIN provided CI-1 with fraudulent New

Hampshire driver's license containing personal identifying information that belonged to residents of New Hampshire.

Overt Acts

8. In furtherance of the conspiracy and to effect its object, PAULIN and his co-conspirators committed and caused the following overt acts, among others, to be committed in the District of New Hampshire and elsewhere.

9. On or about the dates charted below, PAULIN drove CI-1 to the Citizen's Bank branches charted below to make and attempt to make unauthorized withdrawals from the listed New Hampshire Citizens Bank accounts.

Overt Act	Date	Transaction Branch Location	Last Four Digits of Account No.	Account Holder	Amount Withdrawn or Attempted to Withdraw
1	12/30/2017	Framingham, MA	7285	D.C.	\$3,500
2	1/16/2018	Sturbridge, MA	5468	W.B.	\$4,500
3	1/20/2017 2018	Westborough, MA	0293	A.K.	\$4,500 (attempt)

WJ MTH

All in violation of Title 18, United States Code, Section 1349.

COUNTS TWO THROUGH FOUR

[18 U.S.C. §1344 – Bank Fraud]

10. The Grand Jury re-alleges paragraphs 1 through 3 and 6 through 9.

11. Beginning on an unknown date, but at least by on or about September 21, 2017, and continuing to on or about January 20, 2018, in the District of New Hampshire and elsewhere, the defendant,

ALBERT PAULIN,

knowingly executed and attempted to execute a scheme and artifice to defraud Citizens Bank.

12. Specifically, on or about the dates charted below, Paulin executed and attempted to execute this scheme by driving CI-1 to the Citizen's Bank branches charted below to make and attempt to make unauthorized withdrawals from the listed New Hampshire Citizens Bank accounts.

Count	Date	Transaction Branch Location	Last Four Digits of Account No.	Account Holder	Amount Withdrawn or Attempted to Withdraw
2	12/30/2017	Framingham, MA	7285	D.C.	\$3,500
3	1/16/2018	Sturbridge, MA	5468	W.B.	\$4,500
4	1/20/2017 2018	Westborough, MA	0293	A.K.	\$4,500 (attempt)

MB MTH

All in violation of Title 18, United States Code, Section 1344.

COUNTS FIVE THROUGH SIX
[Aggravated Identity Theft, 18 U.S.C. § 1028A]

13. The Grand Jury re-alleges paragraphs 1 through 3 and 6 through 12.
14. On or about the dates charted below, in the District of New Hampshire and elsewhere, the defendant,

ALBERT PAULIN,

during and in relation to the felony violation of bank fraud in violation of Title 18, United States Code, Section 1344, knowingly possessed and used, without lawful authority, means of identification—including names, bank account numbers, and purported drivers licenses containing dates of birth—of another person as set forth below:

Count	Date of Withdrawal or Attempted Withdrawal	Person Whose Identity was Used	Last 4 Digits of Account Number
5	12/30/2017	D.C.	7285
6	1/16/2018	W.B.	5468

All in violation of Title 18, United States Code, Sections 1028A.

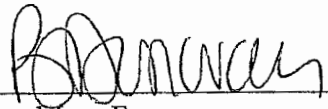
NOTICE OF CRIMINAL FORFEITURE PURSUANT TO
18 U.S.C. § 981(A)(1)(c) AND 28 U.S.C. § 2461(c)

The Grand Jury realleges the allegations in Counts One through Six for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 981(A)(1)(c) and 28 U.S.C. § 2461(c). Upon conviction, the defendant shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

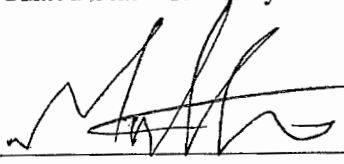
All in accordance to 18 U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461(c), and Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL

Date: September 4, 2019


Grand Jury Foreperson

SCOTT W. MURRAY
United States Attorney


Matthew T. Hunter
Special Assistant United States Attorney

AO 442 (Rev. 11/11) Arrest Warrant

UNITED STATES DISTRICT COURT

for the

District of New Hampshire

RECEIVED
SEP 05 2019

BY:

United States of America

v.

ALBERT PAULIN

Case No. 19-cr- 105-JL-01

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) ALBERT PAULIN,

who is accused of an offense or violation based on the following document filed with the court:

- ☒ Indictment
 ☐ Superseding Indictment
 ☐ Information
 ☐ Superseding Information
 ☐ Complaint
☐ Probation Violation Petition
 ☐ Supervised Release Violation Petition
 ☐ Violation Notice
 ☐ Order of the Court

This offense is briefly described as follows:

Count 1 18 USC §1349 Conspiracy to Commit Bank Fraud
 Counts 2-4 18 USC §1344 Bank Fraud
 Counts 5-6 18 USC §1028A Aggravated Identity Theft

Date: 9/5/2019City and state: Concord, New HampshireKathy Dupont

Issuing officer's signature

Kathy Dupont
Deputy Clerk

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

RECEIVED
SEP 02 2019

BY:

10-11-2019



Prostate